

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

-----X	:	
AVOCET SHIPPING,LLC,	:	
BITTERN SHIPPING LLC,	:	
CANARY SHIPPING LLC,	:	
CRANE SHIPPING LLC,	:	
EGRET SHIPPING LLC,	:	
FALCON SHIPPING LLC,	:	
GREBE SHIPPING LLC,	:	
IBIS SHIPPING LLC,	:	
KINGFISHER SHIPPING LLC,	:	2:16-cv-000834
MARTIN SHIPPING LLC,	:	
NIGHTHAWK SHIPPING LLC,	:	
SHRIKE SHIPPING LLC,	:	
THRUSH SHIPPING LLC,	:	
and WREN SHIPPING LLC	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
NAVIG8 BULK POOL INC.	:	
	:	
Defendant.	:	
-----X	:	

**MOTION FOR ORDER APPOINTING SPECIAL PROCESS
SERVER PURSUANT TO F.R.C.P. RULE 4(C)**

Plaintiffs AVOCET SHIPPING, LLC, BITTERN SHIPPING LLC, CANARY SHIPPING LLC, CRANE SHIPPING LLC, EGRET SHIPPING LLC, FALCON SHIPPING LLC, GREBE SHIPPING LLC, IBIS SHIPPING LLC, KINGFISHER SHIPPING LLC, MARTIN SHIPPING LLC, NIGHTHAWK SHIPPING LLC, SHRIKE SHIPPING LLC, THRUSH SHIPPING LLC, and WREN SHIPPING LLC (collectively referred to as "Plaintiffs"), by and through their attorneys, Thomson, Rhodes & Cowie, P.C. and Tisdale Law Offices, LLC (*pro hac vice* pending) submit within Motion for an Order appointing a special

process server to serve the Verified Complaint, Process of Maritime Attachment and Garnishment, Interrogatories or other process in this action.

As more fully discussed in the accompanying Affidavit of Glenn H. Gillette, Esquire, in support of the application for a maritime attachment, an alternative process server is necessary to effect swift service of the Writ of Attachment and Complaint to permit the Plaintiffs to obtain security for their claims against Defendant. Furthermore, since physical property such as a vessel is not subject of this request for a maritime attachment, the United States Marshal need not serve the Writ.

Additionally, in order to avoid the need to repetitively serve the garnishees continuously throughout the day, any copy of the Process of Maritime Attachment and Garnishment that is served on the garnishee herein should be deemed effective and continuous throughout any given day. This will conserve party and Court resources. A proposed order appointing special process server is attached hereto as Exhibit 1.

Respectfully submitted,

By/s/David M. McQuiston, Esquire

THOMSON, RHODES & COWIE, P.C.
Firm #720
Two Chatham Center, 10th Floor
Pittsburgh, PA 15219-3499
(412) 232-3400 (P)
(412) 232-3498 (F)
dmm@trc-law.com

Counsel for Plaintiffs